

SM

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MICHAEL C. MAYO,

Plaintiff,

V.

Case No. : 1:21-cv-05014

Hon. M. David Weisman

THOMAS DART

Defendant.

FILED

APR 11 2023 SH

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

PLAINTIFF'S REQUESTS FOR PRODUCTION
TO DEFENDANT THOMAS DART

1. Produce evidence that the defendant was passing out bars of soap to inmates on March 13, 2020, when plaintiff filed grievance about this matter. (Any logs or records)
2. When plaintiff's grievance about the lack of soap was answered on 4-20-2020, it was stated that soap was passed out twice a week. Produce evidence this is true. (Any logs or records)

3. When the defendant authorized the distribution of the .35 oz Amer Fresh 3in1 packs, what rubric was used to determine the amount needed for an adult man to wash his hands and take showers for the week.
4. Provide evidence that, 3G where plaintiff was housed in March 2020 was being cleaned properly on a daily basis (Any logs or records)
5. Provide evidence that mask were being distributed, during March 2020, to detainees in division 8/3G.
6. Provide evidence that hand sanitizer was available for all detainees on 3G during March 2020. (Any logs or records)
7. Provide evidence that laundry was done for Tier 3G during March 2020. (Any logs or records)
8. Provide evidence medical slips were being collected and answered. (Any logs or records)
Time request are between Jan 2020 - April 2020

9. On April 27, 2020 a federal judge placed an injunction on CCDOC requiring them to stop the use of bullpens. Provide evidence that plaintiff was not placed in the 3 west bullpen in division 8 at anytime during April 29, 2020, with more than 15 detainees.

10. Provide evidence that after plaintiff tested positive for COVID-19 on April 17, 2020, no newly infected detainees were added to his tier (Any logs or records)

11. In 2021 plaintiff was transferred to Tier 3F which is next to 3G. Provide the number of times 3F was placed on quarantine due to exposure to COVID-19 from Dec. 2021 - June 2022.

12. Provide evidence that on March 21, 2020 guards did not start frequently leaving tiers unguarded (Any logs or records)

13. Detainees are at times provided mask with wire in them to help the mask form around the nose. Assuming this wire is installed by the manufacturer to provide the best protection, it is important that

it is not removed. Provide evidence that at no time, defendant instructed guards to alter these mask by removing the wires.

14. Provide evidence that no officer working an isolation or quarantine tier was allowed to work a non isolated or quarantined tier without being tested for COVID first.

15. On March 15, 2023, Honorio Perez 2018-0117059 was a detainee housed in division 8 Tier 3F, where plaintiff is housed. On March 13th 2023, Mr Perez was tested for COVID. On March 15, 2023, Honorio Perez was informed by medical staff that he had tested positive for COVID and was removed from the tier and sent to Cermak for treatment. Provide evidence that after Mr. Perez's positive result for COVID, no detainee was transferred off 3F to another tier or division without being tested. (Any logs or records)

16. After Honorio Perez tested positive for COVID on March 15, 2023, were any detainees on 3F that were exposed to Perez allowed to work off the tier in close proximity to other detainees and officers that had not been exposed to COVID.

17. Provide the names and positions of the individual(s) who authorized the removal of wire from surgical face mask.

18. Provide the names and positions of the individuals who authorized the transfer of detainees out of tier 3F (division 8) after Mr. Perez's positive COVID result on March 15, 2020.

19. Provide the names and inmate numbers of the detainees transferred out of 3F up to 7 days after Mr. Perez's positive COVID test result on March 15, 2020.

20. Provide the names and inmate numbers of the detainee's housed in division 8 tier 3G with plaintiff when he tested positive for COVID on April 17, 2020.

21. Provide the full name of the federal judge who placed an injunction on CCDOC requiring them to provide daily mask to all inmates, hand sanitizer, stop the use of bullpens and group housing.

Sincerely,

Michael C. Mayo

Michael C. Mayo
20181127027
2700 S. California
Chicago, IL 60608


CERTIFICATE OF SERVICE

The undersigned states that on April 5, 2023,
Plaintiff's Requests for Production to Defendant
were served via United States Postal Service to
the stated address below.

Michael C. Mayo

Troy S. Radunsky
Jason E. DeVore
DeVore Radunsky
230 W. Monroe Suite 230
Chicago, IL 60606

Hon. [REDACTED] M. David Weisman
Office Of Clerk Of The U.S. District Court
United States Courthouse
219 South Dearborn Street
Chicago, IL 60604



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CLERK, U.S. DISTRICT COURT

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District Court
United States Court house
ATTN: Hon. M. David Weisman
219 South Dearborn Street
Chicago, IL 60604



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